

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FELISHATAY ALVARADO	:	
Plaintiff	:	Civil Action No. 22-3763
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, <i>et al.</i>	:	

ORDER

AND NOW, on this _____ day of _____, 2024, upon consideration of Defendants' Motion in Limine to the Testimony and Report of Dr. Veronique Valliere, and Plaintiff's response in opposition thereto, it is hereby **ORDERED** that the Defendants' Motion is **DENIED**.

BY THE COURT:

John F. Murphy, District Judge

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	:	
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**PLAINTIFFS' BRIEF IN OPPOSITION TO
THE DEFENDANTS' MOTION *IN LIMINE* TO THE TESTIMONY AND REPORT OF
DR. VERONIQUE VALLIERE**

The Defendants filed a completely boilerplate motion *in limine* to exclude Plaintiff's well-qualified mental health expert, Dr. Veronique Valliere. The Defendants' motion simply ignores Dr. Valliere's report and *curriculum vitae*, which clearly show that she has been admitted on countless occasions to give testimony regarding emotional distress. Given that Plaintiff has an independently diagnosed case of PTSD, there is plainly a "fit" between Dr. Valliere's qualifications and her opinions in this case.

WHEREFORE, Plaintiff respectfully requests for the Court to ***deny*** the instant Motion, in the form of the attached proposed Order.

Respectfully submitted,

/s/ Keith West
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Attorney for the Plaintiff

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CERTIFICATE OF SERVICE

I, Keith West, Esquire, on this date, by electronic filing, caused a true and correct copy of Plaintiff's above Brief to be served on the Defendants.

Jonah Santiago-Pagan, Esquire
Emily Hoff, Esquire
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
Attorney for Defendants

Respectfully submitted,

/s/ Keith West
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